

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LUIS ANTONIO GUAMAN CASTRO,)	
)	
Petitioner,)	Case No. 1:25-cv-11625
)	
v.)	PETITION FOR WRIT OF
)	HABEAS CORPUS
)	
PATRICIA HYDE, Field Office Director,)	
MICHAEL KROL, HSI New England Special)	
Agent in Charge, TODD LYONS, Acting)	
Director U.S. Immigrations and Customs)	
Enforcement, ANTONE MONIZ, Superintendent,)	
Plymouth County Correctional Facility and)	
KRISTI NOEM, U.S. Secretary of Homeland)	
Security,)	
)	
Respondents.)	
)	

INTRODUCTION

1. Petitioner Luis Antonio Guaman Castro is a national of Ecuador. On information and belief, he was detained by federal immigration agents on May 27, 2025 without a warrant and without any removal proceedings having been initiated.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that Petitioner was unlawfully detained and order his release.

JURISDICTION

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides in Milford, MA and was placed into custody in

Plymouth, MA, and on information and belief is detained in the District of Massachusetts.

PARTIES AND FACTS ALLEGED

6. Luis Antonio Guaman Castro resides with his partner and their 11-year-old daughter, a United States citizen, in Milford, MA.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the U.S. Secretary of Homeland Security.
11. Respondent Antone Moniz is the Superintendent of the Plymouth County Correctional Facility and is petitioner's immediate custodian.
12. All respondents are named in their official capacities.
13. Petitioner is a national of Ecuador. On September 27, 2021, he was granted lawful status in the form of INA withholding under INA section 241(b)(3)(B).
14. On information and belief, on May 27, 2025, U.S. Immigration and Customs Enforcement agents detained him without a warrant and prior to initiating any removal proceedings, in violation of his due process rights.
15. On information and belief, Petitioner is currently in custody in the District of Massachusetts, and one or more of the Respondents is his immediate custodian.
16. Upon information and belief, Petitioner is at risk of imminently being removed from Massachusetts.

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

17. On information and belief, Petitioner is currently under arrest and being detained by federal agents in violation of his constitutional right to due process of law.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;
- (3) Declare that Petitioner's detention violated the Due Process Clause of the Fifth Amendment;
- (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately;
and
- (5) Grant any further relief this Court deems just and proper.

THE PETITIONER

By /s/ Luke Ryan

His Attorney
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